

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**Docket No. 2019-176-E**

In re:	)	
South Carolina Energy Freedom	)	
Act (H.3659) Proceeding to	)	
Establish Each Electrical Utility's	)	<b>JOHNSON DEVELOPMENT ASSOCIATES,</b>
Standard Offer, Avoided Cost	)	<b>INC. AND SOUTH CAROLINA SOLAR</b>
Methodologies, Form Contract	)	<b>BUSINESS ALLIANCE, INC'S JOINT</b>
Power Purchase Agreements,	)	<b>PETITION TO SET CONSOLIDATED</b>
Commitment to Sell Forms,	)	<b>SCHEDULE</b>
and Any Other Terms or	)	
Conditions Necessary	)	
(Includes Small Power Producers	)	
as Defined in 16 United States	)	
Code 796, as Amended)	)	

**Petition of Johnson Development Associates, Inc. and South Carolina Solar Business Alliance, Inc. to Set Consolidated Schedule**

Johnson Development Associates, Inc. ("JDA") and South Carolina Solar Business Alliance ("SCSBA") (collectively "Joint Petitioners"), in accordance with SC Code of Laws § 58-41-20 and SC Code Regs. 103-825, submit this Petition to Set a Consolidated Procedural Schedule in Docket No. 2019-176-E<sup>1</sup>. Joint Petitioners are intervenors in this proceeding.

On May 23, 2019, the Public Service Commission of South Carolina ("Commission") filed an application to open this Docket in accordance with South Carolina's Energy Freedom Act ("The Act"). On May 30, 2019, the Commission instructed staff to open dockets specific to Dominion Energy South Carolina ("Dominion"), Duke Energy Carolinas, LLC ("DEC"), and Duke Energy

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<sup>1</sup> Inasmuch as the Commission grants the relief requested in this Petition, Joint Petitioners request that Order be made applicable to Docket No. 2019-184-E, Docket No. 2019-185-E, and Docket No. 2019-186-E.

Progress, LLC (“DEP”) (collectively “Duke”).<sup>2</sup> The Commission has not yet established a procedural schedule for any of the dockets.

In recognition of the accelerated timeline established by The Act for Commission approval of avoided cost methodologies and rates, and consistent with the comments filed by Joint Petitioners with this Commission on June 18, 2019 (“Joint Comment Letter”), the Joint Petitioners hereby petition this Commission to establish a consolidated procedural schedule in Docket No. 2019-176-E that includes the following issues:

1. The filing of Initial Comments by all Parties on avoided cost methodology requirements;
2. The holding of a technical conference, or other appropriate proceeding as determined by the Commission, held to directly solicit additional information from Parties regarding the avoided cost methodologies and principles presented in Initial Comments;
3. The filing of Supplemental Comments by all Parties following the technical conference; and
4. A Commission Order establishing avoided cost methodological guidelines.

After the Commission issues an order establishing guidelines on avoided cost methodologies, the Commission would (either in this docket or in utility-specific dockets) consider specific avoided cost and other proposals, allowing for intervention, discovery, filed comments or testimony, and an evidentiary hearing as required by the Act.

The Joint Petitioners consider the Proposed Tentative Schedule recommended in the Joint Comment Letter to be reasonable, but also do not oppose the Commission soliciting input from any interested Party regarding an appropriate and reasonable procedural schedule for the four items described above. The Joint Petitioners also request that the Commission solicit input from

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<sup>2</sup> Opened in Docket No. 2019-184-E, Docket No. 2019-185-E, and Docket No. 2019-186-E, respectively.

interested Parties regarding scheduling and consolidation details related to avoided cost rate proceedings that would take place after the Commission's Order on avoided cost methodology guidelines.

The South Carolina Office of Regulatory Staff ("ORS") does not object to the approach subject to this Petition or to the proposed schedule contained in the Joint Comment Letter.

WHEREFORE, Joint Petitioners pray that this Commission establish a consolidated procedural schedule in Docket No. 2019-176-E that includes the issues enumerated in this Petition.

Respectfully submitted this 21st day of June, 2019.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: s/James H. Goldin

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